



DEVAL L. PATRICK  
GOVERNOR

TIMOTHY P. MURRAY  
LT. GOVERNOR

KEVIN M. BURKE  
SECRETARY

*The Commonwealth of Massachusetts*  
*Executive Office of Public Safety and Security*  
*Department of Fire Services*

*P.O. Box 1025 ~ State Road*

*Stow, Massachusetts 01775*

*(978) 567~3100 Fax: (978) 567~3121*



STEPHEN D. COAN  
STATE FIRE MARSHAL

THOMAS P. LEONARD  
DEPUTY STATE FIRE MARSHAL

## **MEMORANDUM**

**TO:** Licensing Officials, Local Building Inspectors, and Heads of Fire Departments –  
Local Cities and Towns

**FROM:** Stephen D. Coan, State Fire Marshal  
Thomas G. Gatzunis, Commissioner of Public Safety

**DATE:** June 1, 2008

**SUBJECT:** Temporary Housing at Traveling Carnivals

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During recent inspections conducted of traveling carnivals, the Department of Public Safety and the Department of Fire Services have become aware of potentially serious safety issues regarding the use of makeshift box trailers at these shows. Specifically, some of the amusement operators are housing their workers, on site, in retrofitted box trailers. These box trailers are typically hidden within the perimeter of the carnival's rides and games and are being used for various purposes, including makeshift cafeterias and worker housing. In many cases, the condition of these trailers presents a serious life safety hazard. The interiors of these box trailers are typically modified so that there is a narrow (2½ feet wide) hallway with several small bedrooms, partitioned by particleboard, located off the hallway. In the event of a fire or other emergency, there is inadequate ingress/egress.

Further, the location of these trailers significantly hinders the ability of the fire department to access these trailers, as there are often rides, games, and other equipment obstructing the trailers from fire department apparatus. Should a fire or other emergency develop in one of these trailers or in this area, there could be serious consequences with the potential for multiple fatalities and injuries.

Due to this situation, we are advising that any city or town issuing a permit pursuant to M.G.L. c. 140, § 181 include a condition which **prohibits** sleeping in box trailers on the grounds. If the city or town wishes to allow these trailers, such trailers should be inspected and meet minimum fire, building, and sanitary code requirements.

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